

IN RE: AMERICAN EXPRESS v. VEE VINHEE
Case No.: LA-03-29549-SB Adversary Number: LA-03-02660-SB

DECLARATION OF DENNIS WINTERS

RE: REQUEST FOR ENTRY OF DEFAULT

I, Dennis Winters, state:

- 6 1. I am the attorney for Plaintiff; and

7 2. The Debtor and Defendant was served at the address in the Debtor's Schedules
8 as shown on the attached Proof of Service; and

9 3. The time to serve an Answer has passed, and our office did not receive any
10 Answer to date. The Defendant is in default.

11 I declare under penalty of perjury under the laws of the United States of America the
12 foregoing is true and correct.

13 | Executed on February 9, 2004, at Santa Ana, California.

Dennis Winters, Esq.
Winters Law Firm
1820 East 17th Street
Santa Ana, CA 92705

6

In re

CHAPTER 7

VEE VINHEE

Debtor. CASE NUMBER : LA-03-29549-SB

PROOF OF SERVICE BY MAIL

STATE OF CALIFORNIA COUNTY OF ORANGE

I am employed in the above County, State of California. I am over the age of 18 and not a party to the within action. My business address is as follows:

1820 East 17th Street
Santa Ana, CA 92705

On **February 10, 2004**, I served the foregoing document described as: **REQUEST FOR ENTRY OF DEFAULT UNDER LOCAL BANKRUPTCY RULE 9021-1 and DEFAULT DECLARATION** on the interested parties at their last known address in this action by placing a true and correct copy thereof in a sealed envelope with postage thereon fully prepaid in the United States Mail at Santa Ana, California, addressed as follows:

Vee Vinhnee
1223 Cherry Avenue, #140
Long Beach, CA 90813-3913

Michael M. Gill, Esquire
3699 Wilshire Boulevard
Suite 820
Los Angeles, CA 90010

Addresses continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: February 10, 2004

Christine Ross
Type Name

Christine Ross
Signature

Attorney or Party Name, Address, Telephone & FAX Numbers, and California State Bar Number Dennis Winters, Esq (CA Bar No. 89872) WINTERS LAW FIRM 1820 East 17th Street Santa Ana, CA 92705 Telephone: (714) 836-1381 Faxsimile: (714) 542-2495		RECEIVED 03 OCT 27 PH 4:14 CLERK U.S. BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA BY [Signature]
Attorney for Plaintiff		03 NOV -3 PM 3:25
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA		03 NOV -3 PM 3:25
In re: VEE VINHNEE, Debtor.	CHAPTER <u>7</u> CASE NUMBER 03-29549SB	03 OCT 27 PH 4:14
AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC., vs. VEE VINHNEE, Defendant(s).	<i>(The Boxes and Blank Lines below are for the Court's Use Only) (Do Not Fill Them In)</i> SUMMONS AND NOTICE OF STATUS CONFERENCE	

TO THE DEFENDANT: A Complaint has been filed by the Plaintiff against you. If you wish to defend yourself, you must file with the Court a written pleading, in duplicate, in response to the Complaint. You must also send a copy of your written response to the party shown in the upper left-hand corner of this page. Unless you have filed in duplicate and served a responsive pleading by DEC 01 2003, the Court may enter a judgment by default against you for the relief demanded in the Complaint.

A Status Conference on the proceeding commenced by the Complaint has been set for:

Hearing Date: DEC 23 2003	Time: 10:00 AM	Courtroom: 1575	Floor: 15th
<input checked="" type="checkbox"/> 255 East Temple Street, Los Angeles <input type="checkbox"/> 411 West Fourth Street, Santa Ana			
<input type="checkbox"/> 21041 Burbank Boulevard, Woodland Hills <input type="checkbox"/> 1415 State Street, Santa Barbara			
<input type="checkbox"/> 3420 Twelfth Street, Riverside			

PLEASE TAKE NOTICE that if the trial of the proceeding is anticipated to take less than two (2) hours, the parties may stipulate to conduct the trial of the case on the date specified, instead of holding a Status Conference. Such a stipulation must be lodged with the Court at least two (2) Court days before the date set forth above and is subject to Court approval. The Court may continue the trial to another date if necessary to accommodate the anticipated length of the trial.

OCT 28 2003
Date of Issuance: _____

JON D. CERETTO
Clerk of the Bankruptcy Court

By: _____
Denise O'Guin
Deputy Clerk

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is: 1820 East 17th Street, Santa Ana, California 92705

On **October 31, 2003**, I served the foregoing document described as:

**SUMMONS AND NOTICE OF STATUS CONFERENCE; PUBLIC NOTICE REGARDING PRO BONE PROGRAM;
PUBLIC COUNSEL LAW CENTER NOTICE(English & Spanish); STATUS CONFERENCE INSTRUCTION NOTICE;
FOURTH AMENDED ORDER REGARDING TELEPHONIC STATUS CONFERENCE IN ADVERSARY PROCEEDING
INSTRUCTIONS FOR TELEPHONIC CASE MANAGEMENT CONFERENCES;
NOTICE REGARDING TELEPHONIC APPEARANCE
COMPLAINT TO DETERMINE DISCHARGEABILITY OF DEBT;**

by placing a true copy thereof enclosed in a sealed envelope addressed as stated:

Vee Vinhnee
1223 Cherry Avenue, #140
Long Beach, CA 90813-3913

Michael M. Gill, Esquire
3699 Wilshire Boulevard
Suite 820
Los Angeles, CA 90010

Office of the United States Trustee
725 South Figueroa Street, 26th Floor
Los Angeles, CA 90017

BY MAIL AS FOLLOWS:

I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on the same day with postage, thereon, fully prepaid at Santa Ana California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation or postage meter date is more than one day after the deposit for mailing in affidavit.

Executed on **October 31, 2003**, Santa Ana, California.

I declare under penalty of perjury under the laws of the United States of America that I served the document as referenced above, and that I am employed in the office of a member of the bar of this court at whose directions the service was made and that the service in question was made as indicated.

Christine Ross
Christine Ross